SENATOR ALFONSE M. D'AMATO CHAIRMAN

> JOHN D. HEUBUSCH EXECUTIVE DIRECTOR

> > July 25, 1996

Mr. Andy Dodson Reports Analyst Federal Election Commission 999 E Street, NW Washington, DC 20463

Reference:

C00027466

Year End Report (12/1/95-12/31/95)

Dear Mr. Dodson:

In response to Jan McBride's letter of June 26, 1996, we are providing the following information:

- A total of \$10,000, the sum of two \$5,000 contributions made on May 23, 1995 and July 17, 1995 from Philip Morris PAC, was erroneously deposited into the NRSC's non-federal account. On December 21, 1995 the Philip Morris PAC requested that the sum of the two contributions be transferred into the NRSC's federal account (copy attached). The NRSC made a transfer of \$10,000 within 10 days of the PAC's request.
- B. On 11/21/95 a \$1,500 contribution from the American Physical Therapy. Congressional Action Committee was erroneously deposited into the committee's federal account. As soon as this error was discovered a transfer was made from the NRSC's federal account to its non-federal account. An amendment has been filed removing the negative amount from line 11c and reporting the \$1,500 dollar transfer on line 29.
- C. Receipts from the Republican National Candidate Trust were over reported on memo Schedule A which itemized every individual regardless of the person's year to date aggregate. An amended January 31, 1996 report has been filed, correcting memo Schedule A in accordance with the instructions outlined in Ms. McBride's letter. The total of the memo schedule \$51,673.14 represents gross receipts for the period of 1/1/95-12/21/95. The transfer of \$65,469.43 reflects the net amount remaining for the entire joint fundraiser after expenses.

D. All advertising expenditures disclosed on Schedule H4 were for classified ads for recruiting staff for NRSC fundraising events. These expenditures were not made on behalf of specifically identified federal candidates and therefore did not have to be disclosed on Schedule B or F supporting Line 23 or 25. The committee will specify such expenditures going forward as "classified advertising".

Sincerely

Stan Huckaby

Treasurer

National Republican Senatorial Committee To:

(202) 675-4730 Fax: Attn: Dave Coray

From: Mr. James E. Boland

Please transfer Philip Morris PAC's May 23, 1995 and July 17, 1995 contributions to your federal account, where they were originally intended:

James E. Boland

Date

12/25/95

Date Director, Washington Relations Philip Morris Companies, Inc.



## FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

JUN 28 1996

Stan Huckaby, Treasurer National Republican Senatorial Committee 425 Second Street NE Washington, DC 20002

Identification Number: C00027466

Reference: Year End Report (12/1/95-12/31/95)

Dear Mt. Huckaby:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-Schedule A, supporting Line 11(c) of your report, discloses a \$10,000 transfer from your non-federal account for "Philip Morris PAC". Please be advised that 11 CFR \$102.5 prohibits your committee from receiving transfers from your non-federal account for non-shared activity. If this transfer represents a misdeposit of federally permissible funds to your committee's non-federal account, please provide the Commission with the exact date of the deposit into the non-federal account.

-Schedule A, supporting Line 11(c) of your report, discloses a negative disbursement of \$1,500 for a transfer from your non-federal account. Please clarify the purpose of this negative transfer. If it represents an actual transfer back to your non-federal account, it should be properly reported on Schedule B, supporting Line 22 of the Detailed Summary Page.

-Line 12 of the Detailed Summary Page discloses \$65,469.43 in transfers from the Republican National Candidate Trust, a joint fundraiser affiliated with your committee. However, you have provided insufficient memo schedules to itemize your committee's share of the gross contributions received. The memo schedule should itemize each individual who has contributed an aggregate in excess of \$200 during the calendar year and provide the amount of unitemized contributions received. In addition, the memo schedule should itemize your

committee's share of all contributions from political committees, regardless of amount. 11 CFR \$102.17(c)(8)(i)(B)

-please clarify all expenditures made for advertising on Schedule H4. If a portion or all of these expenditures were made on behalf of specifically identified federal candidates, this amount should be disclosed on Schedule B or F supporting Line 23 or 25 and include the amount, name, address and office sought by each candidate. 11 CFR \$104.3(b)

A written response or an amendment to your original report(s) correcting the above problem(s) should be filed with the Federal Election Commission within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our tell-free number, (800) 424-9530. My local number is (202) 219-3580.

Sincerely,

Jan McBride

Reports Analyst Reports Analysis Division

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## Federal Election Commission

## ENVELOPE REPLACEMENT PAGE FOR INCOMING DOCUMENTS

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